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UBER TECHNOLOGIES, INC.  
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,  
19 Plaintiff,  
20 v.  
21 UBER TECHNOLOGIES, INC.,  
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
23 Defendants.  
24

Case No. 3:17-cv-00939-WHA

**DECLARATION OF  
MICHELLE YANG IN SUPPORT OF  
DEFENDANTS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF THEIR DISCOVERY  
LETTER BRIEF REGARDING  
MOTION TO COMPEL  
ADDITIONAL DEPOSITION OF  
PIERRE-YVES DROZ AND  
EXHIBITS THERETO**

I, Michelle Yang, declare as follows:

1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendants' Administrative Motion to File Under Seal Portions of Their Discovery Letter Brief Regarding Motion to Compel Additional Deposition of Pierre-Yves Droz and Exhibits Thereto.

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Discovery Letter Brief Regarding Motion to Compel Additional Deposition of Pierre-Yves Droz ("Letter Brief")	Highlighted Portions	Plaintiff (green)
Exhibits 1, 3, 6	Entire Documents	Plaintiff
Exhibit 4	Highlighted Portions	Plaintiff

3. The green-highlighted portions of the Letter Brief and Exhibit 4, and the entireties of Exhibits 1, 3, and 6, contain information that has been designated "Highly Confidential – Attorneys' Eyes Only" by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order ("Protective Order"), which the parties have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this material under seal in accordance with Paragraph 14.4 of the Protective Order.

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4. Defendants' request to seal is narrowly tailored to the portions of the Letter Brief and its supporting papers that merit sealing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 7th day of August, 2017 at Cambridge, Massachusetts.

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/s/ Michelle Yang

Michelle Yang

### ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

Dated: August 7, 2017

/s/ Arturo J. González

Arturo J. González